

Krista J. Nielson, Esq.
Nevada Bar No. 10698
TIFFANY & BOSCO, P.A.
10100 W. Charleston Blvd., Suite 220
Las Vegas, NV 89135
Telephone: (702) 258-8200
Facsimile: (702) 258-8787
knielson@tblaw.com

William M. Sullivan, Jr., Esq. (*Pro Hac Vice* forthcoming)
Thomas C. Hill, Esq. (*Pro Hac Vice* forthcoming)
Alex G. Anderson, Esq. (*Pro Hac Vice* forthcoming)
PILLSBURY WINTHROP SHAW PITTMAN LLP
1200 Seventeenth Street NW
Washington, DC 20036
Telephone: (202) 663-8000
Facsimile: (202) 663-8007
wsullivan@pillsburylaw.com
thomas.hill@pillsburylaw.com
alex.anderson@pillsburylaw.com
Attorneys for Defendant Adam Rogas

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IRONSHORE INDEMNITY INC.,

Plaintiff,

vs.

ADAM ROGAS and ERIC KAY,

Defendants.

Case No.: 2:21-cv-01706-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
ADAM ROGAS TO FILE RESPONSE TO
PLAINTIFF'S AMENDED COMPLAINT
[ECF NO. 3]**

(SECOND REQUEST)

Plaintiff, Ironshore Indemnity Inc. ("Plaintiff"), Defendant, Adam Rogas ("Rogas"), and Proposed Intervenor, Cyber Litigation, Inc. f/k/a NS8 Inc., Proposed Intervenor Argonaut Insurance Company (collectively, the "Parties"),¹ by and through their respective and undersigned counsel, pursuant to LR IA 6-1 and LR 7-1, hereby stipulate and agree as follows:

On September 15, 2021, Plaintiff filed its Complaint for Declaratory Relief [ECF No. 1]. Thereafter, Plaintiff filed its Amended Complaint [ECF No. 3]. Rogas subsequently executed a

¹ Counsel for Defendant Eric Kay, who has not appeared in this action, also consents to the extension.

1 Waiver of Service, whereby he agreed to file a response to the Amended Complaint by November
2 19, 2021. The parties now agree to extend the deadline for Rogas to file his response to December
3 10, 2021.

4 This is the second stipulation for extension of time for Rogas to respond to Plaintiff's
5 Amended Complaint. The prior stipulation for extension of time was denied, without prejudice,
6 for failure to provide a good cause basis for the extension. [ECF No. 12]. The decision to grant
7 an extension or continuance is within the sound discretion of the trial court. *F.T.C. v. Gill*, 265
8 F.3d 944, 954-55 (9th Cir. 2001). Federal Rule of Civil Procedure 6(b)(1) provides that when an
9 act must be done within a specified time, the Court "may, for good cause, extend the time . . .
10 with or without motion or notice if the court acts, or if a request is made, before the original time
11 or its extension expires . . ."

12 This Court should grant the extension as the request is timely made and will provide Mr.
13 Rogas' counsel additional time to adequately address the contentions in the Amended Complaint
14 while counsel is contemporaneously engaged in defending Mr. Rogas in the criminal matter
15 *United States v. Rogas*, 20-cr-00539, as well as the Security and Exchange Commission's civil
16 complaint in *United States Securities and Exchange Commission v. Adam P. Rogas, et al.*, 20-cv-
17 07628. Additionally, Mr. Rogas' local counsel has only recently been retained and is currently
18 getting up-to-speed on the matter and will be out of town due to the upcoming holiday. Further,
19 the parties will not suffer prejudice as every party involved has agreed to the proposed extension.
20 Thus, as the extension is requested in good faith and is not for the purposes of delay or to prejudice
21 any other party, the parties respectfully request that the extension be granted.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

WHEREFORE, based on the foregoing, IT IS HEREBY STIPULATED AND AGREED that the deadline for Rogas to respond to the Amended Complaint shall be extended to December 10, 2021.

DATED this 19th day of November, 2021.

DATED this 19th day of November, 2021.

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

TIFFANY & BOSCO, P.A.

/s/ Chad C. Butterfeld, Esq.

/s/ Krista J. Nielson, Esq.

Chad C. Butterfeld, Esq.

Krista J. Nielson, Esq.

Nevada Bar No. 10532

Nevada Bar No. 10698

6689 Las Vegas Blvd. South, Suite 200

10100 W. Charleston Blvd., Suite 220

Las Vegas, Nevada 89119

Las Vegas, Nevada 89135

Attorney for Plaintiff Ironshore Indemnity Inc.

Attorney for Defendant Adam Rogas

DATED this 19th day of November, 2021.

DATED this 19th day of November, 2021.

SNELL & WILMER, L.L.P.

LEWIS BRISBOIS BISGAARD & SMITH,
LLP

/s/ Richard C. Gordon, Esq.

/s/ Jeffrey D. Olster, Esq.

Richard C. Gordon, Esq.

Jeffrey D. Olster, Esq.

Nevada Bar No. 9036

Nevada Bar No. 8864

3883 Howard Hughes Parkway, Suite 1100

6385 S. Rainbow Boulevard, Suite 600

Las Vegas, Nevada 89169

Las Vegas, Nevada 89118

Attorney for Intervenor Cyber Litigation Inc.
f/k/a NS8 Inc.

Attorney for Intervenor Argonaut Insurance
Company

Order

IT IS SO ORDERED

DATED: 10:28 am, November 22, 2021



BRENDA WEKSLER

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify and declare under penalty of perjury that on November 19, 2021, I electronically filed the foregoing with the Clerk of Court for filing and uploading to the CM/ECF system which will send notification of such filing to all parties of record.

DATED: November 19, 2021

TIFFANY & BOSCO, P.A.

By: /Krista J. Nielson, Esq.

Krista J. Nielson (NV SBN 10698)
Attorneys for Defendant, Adam Rogas